

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 15-36 Erie

ELIZABETH McMAHAN

**MOTION FOR PRELIMINARY ORDER OF CRIMINAL FORFEITURE
AGAINST ELIZABETH McMAHAN**

AND NOW comes the United States of America by and through its counsel, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Lee J. Karl, Assistant United States Attorney for the Western District of Pennsylvania, and pursuant to Federal Rule of Criminal Procedure 32.2, respectfully moves for a preliminary order of forfeiture, and in support thereof, represents as follows:

1. On January 28, 2019, Elizabeth McMahan ("McMahan") entered a guilty plea to Count Twenty-five of the Indictment at Criminal No. 15-36 Erie. McMahan also agreed to forfeit all right, title and interest in the following property, further described at asset identification number 16-FBI-000354 (the "Subject Property") to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C): a 2010 Dodge Grand Caravan SXT, VIN 2D4RN5D14AR138708.

2. The United States respectfully requests that the Court enter a Preliminary Order of Criminal Forfeiture and that the forfeiture of McMahan's interest in the Subject Property be incorporated into her sentence and judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

3. Upon the issuance of the Preliminary Order of forfeiture against McMahan, the United States will provide written notice to all third parties, if any, known to the United States

who may have an interest in the Subject Property. The United States will also advertise notice of this forfeiture proceeding via the government's internet forfeiture website.

WHEREFORE, the United States respectfully requests that this Honorable Court enter a Preliminary Order of Criminal Forfeiture forfeiting to the United States all right, title and interest of the defendant in the Subject Property, and that the forfeiture of the defendant's interest in the Subject Property be incorporated into his sentence and judgment.

Respectfully submitted,

SCOTT W. BRADY
United States Attorney

/s/ Lee J. Karl
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CERTIFICATE OF SERVICE

I hereby certify that the United States' Motion for Preliminary Order of Criminal Forfeiture against Elizabeth McMahan has been served through the electronic filing system this 21st day of March, 2019, upon the following:

Thomas Livingston, AFD
Thomas_Livingston@fd.org

/s/ Lee J. Karl
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